

ATTACHMENT A

COMMENTS ON STORMWATER FSP

Section 1

1. Page 2, Section 1.2. Please clarify in this section that stormwater filter sampling may be conducted as a last resort and that the other contingencies for sediment traps discussed in this document will be relied upon to ensure that the sediment traps are collecting sufficient material.
2. Page 5, Section 1.5.3.2. The section for Sediment Traps is numbered incorrectly; it needs to be corrected to Section 1.4.3.2.

Section 2

3. Page 7, Section 2.1, second paragraph, 3rd sentence. The word “as” should be replaced with the word “were.”
4. Page 7, Section 2.1, last paragraph. This paragraph should indicate that there are four types of measurements, not three, since it follows with four sections.
5. Page 7, Section 2.1.1. This section needs to discuss the process for optimizing the automated samplers. Additional protocols that describe how the samplers will be preprogrammed must be provided. EPA does not expect a full detailed description of sampler programming; however, additional refinements to the sampling protocol as necessary to ensure that the most representative sample possible is being collected should be provided.
6. Page 8, Section 2.1.1, first paragraph, 4th sentence. As written, this paragraph gives the impression that the LWG Field Laboratory or sampling teams will be conducting the analysis. This paragraph needs to clarify that samples will be sent to the Laboratories listed in Tables 2-5a and 2-5b for analysis and that chemical analysis will not be conducted by the LWG Field Laboratory or sampling teams.

Section 3

7. Page 21, Section 3.5.1, first paragraph, 3rd sentence. Strike “filled with deionized water” in this sentence since this practice will not occur in the field under this FSP.
8. Page 23, Section 3.6, bulleted examples. Correct the sample number examples in the second and third bullets to “LW3-STW-CW-1022-1” and “LW3-STW-CW-1022-2”, respectively.
9. Page 24, Section 3.8.1, first paragraph following first set of bullets, 5th sentence (beginning “If this is not possible,...”). This sentence seems to end without completing the thought – “...so that the 1 in 20 requirement.” does what?

Tables

10. Table 2-5a. Remove analysis for “PCB Arochlors” since this analysis will not be conducted for this FSP.

Figures

11. Figure 2-1b. Add location WR-96, Arkema, to this map since this outfall will be monitored as part of this FSP.